



UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GENNADIY GOFMAN

843 Hendrix Street Philadelphia, PA 19116

Plaintiff

No.:

ASSET ACCEPTANCE, LLC

v.

28405 Van Dyke Avenue Warren, MI 48092

Defendant

Jury Trial Demanded

FILED

2738

COMPLAINT

INTRODUCTION

1. This is a lawsuit for damages brought by an individual consumer for Defendant(s)' alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. 1692, et seg. (hereinafter "FDCPA") and the Pennsylvania Fair Credit Extension Uniformity Act, 73 P.S. Section 2270.1 et seq. (hereafter "FCEUA"), constituting unfair and deceptive acts and practices under the Pennsylvania Unfair Trade Practices and Consumer Protection law, 73 P.S. Section 201-1, et seq. (hereafter "UTPCPL"). These laws prohibit debt collectors from engaging in abusive, deceptive and unfair collection practices.

JURISDICTION AND VENUE

2. All previous paragraphs of this complaint are incorporated by reference and made

(oùs 5/12/14

part of this complaint.

- 3. Jurisdiction of this Court arises under 15 U.S.C. Section 1692k(d), 28 U.S.C. Section 1331, 1337 and supplemental jurisdiction exists for the state law claims pursuant to 28 U.S.C. Section 1367. Venue is proper in accordance with 28 U.S.C. Section 1391(b).
- 4. Defendant obtains the benefit(s) of regularly transacting business in Philadelphia County, in the Commonwealth of Pennsylvania.
- Defendant regularly transacts business in Philadelphia County, in the Commonwealth Pennsylvania.

PARTIES

- 6. All previous paragraphs of this complaint are incorporated by reference and made a part of this Complaint.
- 7. Plaintiff is Gennadiy Gofman, an adult individual, (hereinafter "Plaintiff") with a current address of 843 Hendrix Street, Philadelphia, PA 19116.
- 8. Defendant(s) is Asset Acceptance, LLC (hereafter "Defendant") a business engaged in consumer debt collection with a principle place of business located at 28405 Van Dyke Avenue, Warren, MI 48092.

FACTUAL BACKGROUND

9. All previous paragraphs of this Complaint are incorporated by reference as though fully set forth herein.

- 10. On or about years 2001-2009, Plaintiff had a consumer account (joint with Olga Gofman) with Bank of America/FIA Card Services (hereinafter "BOA" account) with an account number of 426429899623***.
- 11. Plaintiff's said account was a consumer account which was used for personal, family and household purposes.
- 12. On or about May/June 2009, BOA charged off the balance of Plaintiff's account number 426429899623*** for the amount of \$16,254.00. On or about September 2012 Defendant purchased and acquired said account from BOA.
- 14. On or about September 2012, when Defendant acquired the account, Defendant added on interest to the account to bring the opening balance of the account when placed with Defendant to a total of \$17,552.00 (Experian and Equifax). (See attached credit reports, Exhibit "A.")
- 15.. On or about September 2012 Defendant stated on Credit Reports, Experian and Equifax, that Plaintiff owes the \$17,552.00 balance regarding said BOA account. Further, it is believed and therefore averred that during the past 365 days, on a monthly basis, Defendant reported and continues to report this \$17,552.00 as owing regarding said BOA account on said credit reports. (See attached Credit Reports, Exhibit "A.")
- 16. It is believed and therefore averred that this interest demand is an intentional misstatement of any amount which could allegedly be owed by Plaintiff to Defendant.
- 17. It is further believed and therefore averred that upon charge-off, the original Creditor (BOA bank) waived the assessment of further interest on the account, and stopped sending monthly statement to Plaintiff which notified Plaintiff of any interest.

 See McDonald v. Asset Acceeptance, LLC, U.S. District Court for the Eastern District of

Michigan, Case No.: 11-cv-13080 (2013) and <u>Simkus v. Cavalry Portfolio</u>, Case No.:11-cv-7425, U.S. District Court for the Northern District of Illinois (2012).

- 18. As interest was waived at charge-off by the original Creditor (HSBC bank),
 Defendant did <u>not</u> acquire the right(s) to assess contractual rate interest beyond chargeoff for the period between charge-off and Defendant's acquisition of the account.
- 19. As interest was waived at charge-off by the original Creditor, Defendant did <u>not</u> acquire the right(s) to assess contractual rate interest even subsequent to its acquisition of the account. See <u>McDonald v. Asset Acceeptance, LLC</u>, U.S. District Court for the Eastern District of Michgan, Case No.: 11-cv-13080 (2013) and <u>Simkus v. Cavalry</u> <u>Portfolio</u>, Case No.:11-cv-7425, U.S. District Court for the Northern District of Illinois (2012).
- 20. By application of the Doctrine of Waiver, any demand for contractual interest misstated any amount allegedly due and owing on the account.
- 21. Defendant retroactively imposed interest which the original Creditor waived.
- 22. The retroactive addition of interest by Defendant, which the original Creditor waived is improper. An assignee steps into the shoes of the assignor as of the date the assignor sells the account, and does not have the right to retroactively reverse the assignor's business decision to not charge interest during a period when the assignee did not hold or own the account.
- 23. "The rule is that an assignee of a contract takes it subject to the defenses which existed against the assignor at the time of assignment." Allis-Chalmers Credit Corp. v. McCormick, 30 Ill. App.3d 423, 331 N.E. 2d 832, 833 (4th Dist. 1975). Accord Montgomery Ward & Co. v. Wetzel, 98 Ill. App. 3d 243, 423 N.E. 1170, 1175, 53 Ill.

- Dec. 366 (1st Dist. 1981) ("the assignee thus takes the assignor's interest subject to all legal and equitable defenses existing at the time of assignment").
- 24. When Defendant retroactively imposed interest, which the original Creditor waived, Defendant misstated the amount of the alleged debt and also attempted to collect an amount which Defendant was not legally allowed to collect, in violation of 15 U.S.C. Section 1692e *et seq.* and 15 U.S.C. 1692f *et seq.* of the FDCPA.
- 25. Defendant knew or should have known that its actions violated the FDCPA and could have brought its actions within compliance of the FDCPA, but failed to do so.
- At all times material hereto the conduct of Defendant as well as its agents, servants and/or employees was malicious, intentional, willful, reckless, negligent and in wanton disregard for federal and state law and the rights of the Plaintiff.

STANDING

- 27. All previous paragraphs of this Complaint are incorporated by reference as though fully set forth herein.
- 28. Plaintiff has standing to bring this action per 15 U.S.C. Section 1692k, because Plaintiff was affected by Defendant's unlawful debt collection activity.
- 29. The three basis components of standing under Article III of the U.S. Constitution are present in this case, "injury, causation and redressability." See <u>Foundation, Inc. v</u>

 <u>Obama</u>, 641 F.3d 803, 805 (7th Cir. 2011).
- 30. Plaintiff suffered an injury because of the harm to his/her consumer credit report which was caused by the misconduct described in this Complaint.

- 31. Plaintiff suffered an injury because his rights under the FDCPA were compromised.
- 32. This action is intended by Plaintiff to redress such harm upon a favorable verdict or settlement of the case.
- 33. Plaintiff need not quantify the amount of the harm or injury suffered in order to establish standing under Article III of the Constitution.
- 34. Plaintiff need not establish a dollar value of the amount of the harm or injury suffered in order to establish standing under Article III of the Constitution.
- 35. Plaintiff need not prove actual damages with regard to the harm or injury suffered in order to establish standing under Article III of the Constitution.

COUNT I VIOLATION OF THE FDCPA 15 USC 1692 et. seq.

- 36. All previous paragraphs of this Complaint are incorporated by reference as though fully set forth herein.
- Plaintiff is a consumer debtor as defined by the Fair Debt Collection Practices Act
 (FDCPA), 15 USC 1692a(3).
- 38. Defendant is a debt collector as defined by the FDCPA, 15 USC 1692a(6).
- 39. At all times mentioned herein, Defendant was attempting to collect on an alleged consumer "debt" against Plaintiff through "communications" as defined by FDCPA 15 U.S.C. Section 1692a(2) and 1692a(5).
- 40. Defendant violated the FDCPA, 15 U.S.C Sections, 1692d, 1692e, 1692e(2), 1692e(10), 1692f and in the following manner:

- Engaging in conduct the natural consequence of which is to harass,
 oppress or abuse any person in connection with the collection of a debt;
- (b) False representation of the amount of the debt;
- (c) Attempting to collect an amount which Defendant was not legally allowed to collect;
- (d) Using false representation, unfair, deceptive or unconscionable means to collect or attempt to collect a debt which is not authorized by law.
- 41. Defendant engaged in per se violations of the FDCPA, 15 U.S.C. Sections 1692d, 1692e and 1692f.
- 42. The FDCPA is a strict liability statue and "because the Act imposes strict liability, a consumer need not show intentional conduct by the debt collector to be entitled to damages. <u>Taylor v. Perrin, Landry, deLaunay & Durand</u>, 103 F.3d 1232 (5th Cir. 1997); <u>Russell v. Equifax A.R.S.</u>, 74 F.3d 30 (2d Cir. 1996).
- 43. Defendant's actions and/or omissions as described above were malicious, intentional, willful, wanton, reckless and negligent against Plaintiff.
- 44. Plaintiff was distressed and suffered from embarrassment, stress and anxiety.
- 45. Defendant is liable for the acts committed by its agents under the doctrine of respondent superior because Defendant's agents were acting within the scope of their employment with Defendant.
- 46. In the alternative, Defendant(s) is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents /

employees were engaged in a joint venture and were acting jointly and in concert.

- 47. Plaintiff reserves the right to pierce the corporate veil under the doctrines of under-capitalization and/or alter ego.
- 48. Any mistake made by Defendant would have included a mistake of Law.
- 49. Any mistake made by Defendant would not have been a reasonable or bona fide Mistake.
- 50. As a result of the above violation of the FDCPA, Plaintiff has suffered losses entitling Plaintiff to statutory, actual and punitive damages and attorney's fees and costs.

VIOLATION OF THE FCEUA AND UTPCPL

- 51. All previous paragraphs of this Complaint are incorporated by reference as though fully set forth herein.
- 52. Defendant is a "debt collector" pursuant to 73 P.S. Section 2271.3 of the FCEUA.
- 53. Plaintiff is a "debtor" pursuant to 73 P.S. Section 2271.3 of the FCEUA.
- 54. The above contacts by Defendant are "communications" relating to a "debt" pursuant to 73 P.S. Section 2271.3 of the FCEUA.
- 55. Defendant engaged in unfair methods of competition and unfair and/or deceptive acts or practices pursuant to the UTPCPL, by attempting to collect the debts in violation of the FCEUA. Defendant's violations of the FCEUA and UTPCPL include, but are not limited to violations of 73 P.S. Section 2270.4(a) as follows:

- Engaging in conduct the natural consequence of which is to harass,
 oppress or abuse any person in connection with the collection of a debt;
- (b) Attempting to collect an amount which Defendant was not legally allowed to collect;
- (c) False representation of the amount of the debt;
- (d) Using false representation, unfair, deceptive or unconscionable means to collect or attempt to collect a debt which is not authorized by law.
- 56. Defendant's actions and/or omissions as described above were malicious, intentional, willful, wanton, reckless and negligent against Plaintiff.
- 57. As a result of the above violation of the FDCPA, Plaintiff has suffered losses entitling Plaintiff to statutory, actual and punitive damages and attorney's fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the following relief be granted:

- (a) Actual damages;
- (b) Statutory Damages;
- (c) Punitive Damages;
- (d) Costs and reasonable Attorneys' fees; and
- (e) All other relief that the Court deems just and proper.

Respectfully Submitted,

BLITSHTEIN & WEISS, P.C.

By:

Tova Weiss, Esquire Iriana Blitshtein, Esquire 648 2nd Street Pike

Southampton, PA 18966

(215)364-4900

Fax (215)364-8050 Attorneys for Plaintiff

Date:

5/12/2014

EQUIFAX

CREDIT FILE: December 4, 2013

Personal Identification Information (This section includes your name, current and previous addresses, and any other identifying information reported by your creditors.)

Name On File:

Gennaday Gofman

Social Security #

XXX-XX-8590 Date of Birth: November 26, 1961

Current Address:

843 Hendrix St, Philadelphia, PA 19116 (215) 671-8045 Reported: 12/2013

Previous Address(es): 7810 Algon Ave, Philadelphia, PA 19111 Reported: 11/2010 648 2nd Street Pike, Southampton, PA 18966 Reported: 11/2013

Formerly Known As:

Gennadiy Gofman

Last Reported Employment: Truck Driver; Olimpic Frame Inc;

ALERT(s): File Blocked For Promotional Purposes

Confirmation # 3338013549

Please address all future correspondence to:



www.investigate.equifax.com



Equifax Information Services LLC Www. Equifax. Com/fcra

Atlanta GA 30348



(800) 377-6568

Amount Past Due - The Amount Past Due as of the Date Reported

Date Mai Delg Rptd - The Date the 1st Major Delinguency Was Reported

Deferred Pay Date - The 1st Payment Due Date for Deferred Loans

Actual Pay Amt - The Actual Amount of Last Payment

Charge Off Amt - The Amount Charged Off by Creditor

Balloon Pay Amt - The Amount of Final(Balloon) Payment

Date Closed - The Date the Account was Closed

Balloon Pay Date - The Date of Final(Balloon) Payment

Date of Last Activity - The Date of the Last Account Activity

Sched Pay Amt - The Requested Amount of Last Payment

Date of Last Paymnt - The Date of Last Payment

Date of 1st Delinguency - The Date of First Delinguency

M - F 9:00am to 5:00pm in your time zone.

In order to speak with a Customer Service Representative regarding the specific information contained in this credit file, you must call WITHIN 60 DAYS of the date of this credit file AND have a copy of this credit file along with the confirmation number.

Collection Agency Information (This section includes accounts that credit granters have placed for collection with a collection agency.)

Diversified Consultants Inc; Collection Reported 10/2013; Assigned 11/2012; Creditor Class - Cable/Cellular; Client - Tmobile; Amount - \$322; Status as of 10/2013 - Unpaid; Date of 1st Delinguency 10/2012: Balance as of 10/2013 - \$322; Individual Account; Account # - 14746138; Address: 10550 Deerwood Park Blvd Dba Dci Jacksonville FL 32256-0596

Credit Account Information

(For your security, the last 4 digits of account number(s) have been replaced by ") (This section includes open and closed accounts reported by credit grantors)

Account Column Title Descriptions:

Account Number - The Account number reported by credit grantor

Date Acct. Opened - The Date that the credit grantor opened the account

High Credit - The Highest Amount Charged Credit Limit - The Highest Amount Permitted

Terms Duration - The Number of Installments or Payments

Terms Frequency - The Scheduled Time Between Payments

Months Reviewed - The Number of Months Reviewed Activity Designator - The Most Recent Account Activity

Creditor Class - The Type of Company Reporting The Account

Date Reported - Date of Last Reported Update

Balance Amount - The Total Amount Owed as of the Date Reported

Status - Condition of Account When Last Updated by Creditor or Otherwise

6: 180 or More Davs Past Due

G: Collection Account

J: Voluntary Surrender

Account History Status Code Descriptions

1:30-59 Days Past Due 2: 60-89 Days Past Due 3:90-119 Days Past Due 4: 120-149 Days Past Due 5: 150-179 Davs Past Due K: Reposséssion L: Charge Off H: Foreclosure

Account Number 9004*			Date Opened High 12/02/2006 \$12				Terms Frequency Monthiv	М		Activity Designator Paid and Closed		editor Classification	
Items As of Date Reported 12/02/2013	Balance Amount \$0	Amount Past Due	. Date of Last Paymn 11/2009	Actual	Scheduled	Date of 1st Delinquency	Date of Last Activity 11/2009	Date Maj. Del. 1st Rptd	Charge Off		ay Balloon Pay	Balloon Pay Date	Date Closed 10/2009
	/s As Ag ito; Fixed	d Rate;		TTT Yorkide augustidad inchinsir	an - Auto Lease; Who			ount; ADD	ITIONAL	INFORMATION -	· Closed or F	Paid Account/Z	'ero
Account Number -	30.0 4 0.000.000		Date Opened High				Terms Frequency	M	onths Revd	Activity Designator		ditor Classification etail	
Items As of Date Reported 11/22/2013	Balance Amount \$17,55	Amount Past Due \$17,55	Date of Last Paymon	Actual	Scheduled Paymnt Amount	Date of 1st Delinquency 12/2009	Date of Last Activity	Date Maj. Del. 1st Rptd 09/2012	Charge Off Amount	Deferred Po Start Date		Balloon Pay Date	Date Closed
Bank of Ar Account Number 4264298996		PO Box 9822	35 El Paso TX 7999 Date Opened High 04/28/1999	Credit C	redit Limit Term		Terms Frequency Monthly	Mo	onths Bevd	Activity Designator Nansfer/Sold	Cre	ditor Classification	
	-						Date of	Date Maj.	Observe Off	Determed D	ay Balloon Pay	Balloon	Date
Status - Cha Account Tra	arge Off; Insferred	or Sold; Charg	ed Off Account;	e of Loan - Cr	Scheduled Paymnt Amount edit Card; Whose Ac	Date of 1st Delinquency 12/2009 count - Join	Last Activity	Del. 1st Aptd 05/2010		Start Date	Amount	Pay Date	Closed
Date Reported 07/17/2012 Status - Cha Account Tra Account Hist with Status C Bank of Ar Account Number	Amount \$0 arge Off; insferred tory Codes	Type of Accour or Sold; Charg 06/2010 05/2010 L 5	Last Paymnt 10/2009 nt - Revolving; Typ ed Off Account; 04/2010 03/2010 02/2 4 3 235 El Paso TX 7998 Date Opened High	Paymnt Amount e of Loan - Cro 1010 01/2010 1 1 18-2235 Credit C	Paymnt Amount edit Card; Whose Ac	Delinquency 12/2009 count - Join	Last Activity t Account;	Del. 1st Agford 05/2010 ADDITION/	Amount \$16,254 AL INFOF	Start Date RMATION - Account	Amount unt Closed A	Pay Date	Closed
Date Reported 07/17/2012 Status - Cha Account Tra Account Hist with Status C Bank of Ar Account Number 4888932997 Items As of Date Reported	Amount \$0 arge Off; Insferred tory Codes merica 799* Balance Amount	Type of Accour or Sold; Charg 06/2010 05/2010 L 5	Last Paymnt 10/2009 nt - Revolving; Typ ed Off Account; 04/2010 03/2010 02/2 4 3 2 235 El Paso TX 7998 Date Opened High 07/26/2001 Date of Last Paymnt	Paymnt Amount e of Loan - Cre 2010 01/2010 2 1 28-2235 Credit C \$ Actual	Paymnt Amount edit Card; Whose Ac	Delinquency 12/2009 count - Join	Last Activity	Del. 1st Agford 05/2010 ADDITION/	Amount \$16,254 AL INFOF	Activity Designator Transfer/Sold Deterred Pa	Amount unt Closed A	Pay Date	Closed
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Date Reported 07/17/2012 Status - Cha Account Tra Account Hist with Status C Bank of Ar Account Number 4888932997 Items As of Date Reported 07/12/2012 Status - Cha Account Tra Account Hist	Amount \$0 arge Off; Insferred tory Codes Merica 799* Balance Amount \$0 arge Off; Insferred tory Codes	Past Due Type of Account or Sold; Charge of Sold; Charge of Account past Due Type of Account or Sold; Charge of Account or Sold; Charge of Account or Sold; Charge of Account past Due Type of Account or Sold; Charge of Account or Sold;	Last Paymet 10/2009 nt - Revolving; Typ ed Off Account; 04/2010 03/2010 02/2 4 3 235 El Paso TX 7998 Date Opened High 07/26/2001 Date of Last Paymet 10/2009 nt - Revolving; Typ ed Off Account; 03/2010 02/2010 01/2 4 3 2	Paymnt Amount e of Loan - Cre 2010 01/2010 2 1 88-2235 Credit S Actual Paymnt Amount e of Loan - Cre 2010 12/2009 2 1 NC 27410-811 Credit C	Paymnt Amount edit Card; Whose Ac credit Limit Term 60 Scheduled Paymnt Amount edit Card; Whose Ac	Delinquency 12/2009 COUNT - Join Date of 1st Delinquency 12/2009 COUNT - Join	Last Activity t Account; erms Frequency Monthly Date of Last Activity	Del. 1st Riftd 05/2010 ADDITION/ Date Maj. Del. 1st Riptd 05/2010 ADDITION/	amount \$16,254 AL INFOF onthis Revol #60 Charge Off Amount \$12,137 AL INFOF	Start Date RMATION - Accordance Activity Designator Transfer/Sold Deferred Particular Date	Amount unt Closed A Cree y Balloon Pay Amount unt Closed A	Pay Date At Consumers f	Closed Request; Date Closed



Prepared for: GENNADIY GOFMAN

Date: December 03, 2013 Report number: 4254-6060-66 Page 4 of 24

Your accounts that may be considered negative (continued)

Credit items ASSET ACCEPTANCE

PO BOX 1630 WARREN MI 48090

Phone number (800) 614 4730

Partial account number

12271....

Address identification number

0040187576

Original creditor FIA CARD

SERVICES N.A.

Payment history

2013

NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT/SEP

Type Date opened Jul 2012 .

First reported Terms Sep 2012 Date of status Sep 2012

Debt Buyer 1 Months Monthly Not reported payment

Not reported

Credit limit or original amount \$16,254 High balance

Recent balance \$17,552 as of Nov/ 2013

Responsibility Individual

Status

Collection account. \$17,552 past due as of Nov 2013. This account is scheduled to continue on record until Sep 2016.

AND = Actual amount paid (\$)

Account history - If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. This section also includes the scheduled payment amounts, amounts actually paid and the dates those payments were made. ND: No Data.

				: 4	= Acc	ount bala	nce (\$)	DRR = Date payment received						= Scheduled payment amount (\$)			
	Oct13	Sep13	Aug13	Jul13	Jun13	May13	Apr13	Mar13	Feb13	Jan13	Dec12	Nov12	Oct12	Sep12	Sep12		
DER	17,477	17,359	17,319	17,223	17,156	16,972	16,940	16,921	16,828	16,753	16,681	16,585	16,510	16,417	16,361		
DPR	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
The o	riginal amo	ount of this	s account	was \$16	,254												

BANK OF AMERICA PO BOX 982235

EL PASO TX 79998

No phone number available Partial account number

488893299799.... Address identification number

.9040187576

Date opened Jul 2001 First reported Jul 2007 Date of status Dec 2009

Type Credit card Terms Monthly payment Not reported

Credit limit or original amount \$18,000 Not reported High balance \$14,471

Recent balance Not reported as of Jul 2012

Responsibility Joint with OLGA GOFMAN **Status**

Closed. \$12,137 written off.

Comment

Account closed at consumer's request.

Creditor's statement

"Purchased by another lender."



Prepared for: **GENNADIY GOFMAN**

Date: December 03, 2013 Report number: 4254-6060-66 Page 5 of 24

Your accounts that may be considered negative (continued)

Payment history	Pay	/ment	his	tory
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2012 2010 2009

JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB

2008

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>	_	_			_			_	_		

PO BOX 982235 **EL PASO TX 79998**

No phone number available

Partial account number 426429899623

Address identification number

0040187576

Date opened Apr 1999

First reported **Terms**

Aug 2003 Date of status Nov 2009

Not reported Monthly payment Not reported

Type Credit limit or Credit card original amount \$28,300

High balance \$21,902

Recent balance Responsibility Joint with Not reported as of

Jul 2012

Status

Closed. \$16,254 written off.

Comment

OLGA GOFMAN

Account closed at consumer's request.

2009

Creditor's statement

"Purchased by another lender."

Payment history

2010

JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB BUT TO KIND IN IN INCH IN INCH

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CHASE BANK USA PO BOX 15298 **WILMINGTON DE 19850** Phone number (800) 955 9900

Partial account number 410413000878....

Address identification number 0040187576

Date opened Type Nov 2002 First reported

Dec 2002

Nov 2011

Date of status

Credit card Terms

Not reported

Not reported Monthly payment

\$3,500 High balance \$7.599

Credit limit or Recent balance original amount Not reported

Responsibility Individual

Status

Closed. \$4,168 past due as of Nov 2011.

OF ON THE OK LOW BANGE FOR TOW

Creditor's statement

"Purchased by another lender."

Payment history

2010 2009

NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV DEC NOV DE

2006

2005

MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC

CREDIT FILE: December 4, 2013

Personal Identification Information (This section includes your name, current and previous addresses, and any other identifying information reported by your creditors.)

Name On File:

Gennaday Gofman

Social Security #

Gennaday Gofman

XXX-XX-8590 Date of Birth: November 26, 1961

Current Address:

843 Hendrix St. Philadelphia, PA 19116 (215) 671-8045 Reported: 12/2013

Previous Address(es): 7810 Algon Ave, Philadelphia, PA 19111 Reported: 11/2010 648 2nd Street Pike, Southampton, PA 18966 Reported: 11/2013

Formerly Known As:

Gennadiy Gofman

Last Reported Employment: Truck Driver; Olimpic Frame Inc; ALERT(s): File Blocked For Promotional Purposes

Confirmation # 3338013549

2

Please address all future correspondence to.



www.investigate.equifax.com

Equifax Information Services LLC Www. Equifax. Com/fcra

Atlanta GA 30348



(800) 377-6568

M - F 9:00am to 5:00pm in your time zone.

In order to speak with a Customer Service Representative regarding the specific information contained in this credit file, you must call WITHIN 60 DAYS of the date of this credit file AND have a copy of this credit file along with the confirmation number.

Collection Agency Information (This section includes accounts that credit grantors have placed for collection with a collection agency.)

Diversified Consultants Inc; Collection Reported 10/2013; Assigned 11/2012; Creditor Class - Cable/Cellular; Client - Tmobile; Amount - \$322; Status as of 10/2013 - Unpaid; Date of 1st Delinquency 10/2012; Balance as of 10/2013 - \$322; Individual Account; Account # - 14746138; Address: 10550 Deerwood Park Blvd Dba Dci Jacksonville FL 32256-0596

Credit Account Information

(For your security, the last 4 digits of account number(s) have been replaced by ") (This section includes open and closed accounts reported by credit grantors)

Account Column Title Descriptions:

Account Number - The Account number reported by credit grantor

Date Acct. Opened - The Date that the credit grantor opened the account

High Credit - The Highest Amount Charged Credit Limit - The Highest Amount Permitted

Terms Duration - The Number of Installments or Payments Terms Frequency - The Scheduled Time Between Paymonts

Months Reviewed - The Number of Months Reviewed Activity Designator - The Most Recent Account Activity

Creditor Class - The Type of Company Reporting The Account

Date Reported - Date of Last Reported Update

Balance Amount - The Total Amount Owed as of the Date Reported

Status - Condition of Account When Last Updated by Creditor

or Otherwise

Amount Past Due - The Amount Past Due as of the Date Reported

Date of Last Paymnt - The Date of Last Payment

Actual Pay Amt - The Actual Amount of Last Payment Sched Pay Amt - The Requested Amount of Last Payment

Date of 1st Delinquency - The Date of First Delinquency

Date of Last Activity - The Date of the Last Account Activity

Date Mai Delg Rptd - The Date the 1st Major Delinquency Was Reported

Charge Off Amt - The Amount Charged Off by Creditor

Deferred Pay Date - The 1st Payment Due Date for Deferred Loans

Balloon Pay Amt - The Amount of Final(Balloon) Payment Balloon Pay Date - The Date of Final(Balloon) Payment

Date Closed - The Date the Account was Closed

Account History Status Code Descriptions

1:30-59 Davs Past Due

2:60-89 Days Past Due 3:90-119 Days Past Due

4: 120-149 Days Past Due

5 : 150-179 Days Past Due

6: 180 or More Days Past Due

G: Collection Account

H : Foreclosure

J: Voluntary Surrender

K : Reposséssion

L: Charge Off

Account Number			Date Op Case 12/02/2006	-		7 38 N.	QA Do	ocument 1 36 Months	Filed Q5() Monthly	L3/14 F	83	,	Signator and Closed		Creditor Classification	<u>екийники</u> т, к
Items As of Date Reported	Balance Amount \$0	Amount Past Due	. Date o	of Paymnt	Actual Paymnt Amo	ount f	Scheduled Paymnt Amou	Date of 1s	t Date of	Date Maj. Del. 1st Rpto	Charge C			Pay Balloon Pa	ay Balloon Pay Da	Date c Closed 10/2009
		; Type of Ac			; Type of L			Whose Accou	nt - Joint Acco	ount; ADD	ITIONAL	INFO	RMATION	- Closed o	or Paid Account	/Zero
Balance; Aut	to, Fixed Ra	ite;			*, *											7.3
												22.52.53	62. Y Z. + A 3. + 3	O 15 ADDAD AS		na loonglayii bir
Asset Acce		ino Asset	Date Opened	High Cr	redit	Warren Will Credit Limit	10 7 12 6 8 CO. A.	36 : (800) 614-4 Terms Duration	730 Terms Frequency		Ionths Revd	Activity [Designator		Creditor Classification Retail	
FIA CARD -1	Balance	Amount	07/24/2012 Date		Actual		Scheduled	Date of 1s	t Date of	Date Maj.	Charge C	Off	Deferred F	ay Balloon Pa	ay Balloon	Date
Date Reported /	Amount \$17,552/	Past Due \$17.55		aymnt	Paymnt Amo	ount F	Paymnt Amou	unt Delinguen 12/200		Del. 1st Rpto 09/2012	Amount		Start Date	Amount	Pay Da	e Closed
		unt; Type of	Account - Op	en; Ty	pe of Loa	n - Debt E	Buyer Acc	count; Whose	Account - Indiv	vidual Acco	ount; Al	DITIO	NAL INFO	RMATION	- Collection Ac	count;
			•						- •			· . •				
Bank of Am	nerica / P	O Box 98223	5 El Paso TX 7	79998-2	2235			X								
Account Number)	Date Opened	High Cr	edit	Credit Limit		Terms Duration	Terms Frequency	N	Ionths Bovd				Creditor Classification	
42642989962	Balance	Amount	04/28/1999 Date o	of	Actual	\$0	Schedulea	Date of 1s	Monthly t Date of	Date Mai. /	Charge C		fer/Sold Deferred F	ay Balloon Pa	ay Balloon	Date
	Amount	Past Due		aymnt	Paymnt Amo		aymnt Amou		Y Last Activity	Del. 1st Reto 05/2010	Amount	. }	Start Date		Pay Dat	e Closed
		e of Accoun	t - Revolving;	Туре	of Loan -	Credit Ca	rd; Whose	e Account - Jo	int Account;	ADDITION	AL INFO	RMAT	ON - Acco	unt Close	d At Consumer	s Request;
Account Tran																
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with Status Co	odes L	5	4 3	2	,											
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Bank of Am	nerica P.	O. Box 9822	35 El Paso TX Date Opened	79998- High Cr	とがけん とりょうり	Credit Limit		Terms Duration	Terms Frequency		onths Revd	Activity E	Designator		Creditor Classification	
48889329979	99*		07/26/2001			\$0			Monthly		60	-	fer/Sold			
Items As of Date Reported 07/12/2012	Balance Amount \$0	Amount Past Due	Date o Last Pa 1 0/20	aymnt	Actual Paymnt Amor		cheduled aymnt Amou	Date of 1s Delinquence 12/200	y Last Activity	Date Maj. Del. 1st Rptd 05/2010		_	Deferred P Start Date	ay Balloon Pa Amount	y Balloon Pay Dat	Date e Closed
Status - Char	ge Off; Type	e of Account	- Revolving;	Туре	of Loan - (Credit Car	rd: Whose	e Account - Jo	int Account;	ADDITION	AL INFO	RMATI	ON - Acco	unt Close	d At Consumer	s Request;
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Account Number	nerica 41		Date Opened	High Cre	edit	7110 : (800) Credit Limit	1 009-bbU <i>1</i>	Terms Duration	Terms Frequency Monthly		onths Revul	,	•		Creditor Classification	
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133675795* Items As of Date Reported 07/01/2005	Balance Amount \$0	Amount Past Due	Date Opened 09/01/2002 Date of Last Pa 06/20	High Cre \$103, f aymnt 005	edit ,000 Actual Paymnt Amou	Credit Limit Sunt P	cheduled aymnt Amoui	Terms Duration Date of 1st Delinquence	Monthly Date of Last Activity 06/2005	Date Maj. Del, 1st Rptd	Charge O Amount	Paid a	nd Closed Deferred P. Start Date	ay Balloon Pa Amount	y Balloon Pay Date	e Closed
133675795* Items As of Date Reported 07/01/2005	Balance Amount \$0 As Agreed	Amount Past Due	Date Opened 09/01/2002 Date of Last Pa 06/20 count - Mortga	High Cre \$103, f aymnt 005	edit ,000 Actual Paymnt Amou	Credit Limit Sunt P	cheduled aymnt Amoui	Terms Duration Date of 1st Delinquence	Monthly Date of Last Activity 06/2005	Date Maj. Del, 1st Rptd	Charge O Amount	Paid a	nd Closed Deferred P. Start Date	ay Balloon Pa Amount	y Balloon	e Closed

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Prepared for: GENNADIY GOFMAN

Date: December 03, 2013 Report number: 4254-6060-66 Page 4 of 24

Credit items

ASSET ACCEPTANCE PO BOX 1630 WARREN MI 48090

Phone number (800) 614 4730

Partial account number

12271....

Address identification number

0040187576

Original creditor FIA CARD

SERVICES N.A.

Payment history

NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT/SEP

Date opened Jul 2012 . First reported Sep 2012 Date of status Sep 2012

Type Debt Buyer Terms 1 Months Monthly payment Not reported Credit limit or original amount \$16,254 High balance Not reported

Recent balance \$17,552 as of Nov, 2013

Responsibility Individual Status

Collection account. \$17,552 past due as of Nov 2013. This account is scheduled to continue on record until Sep 2016.

Account history - If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. This section also includes the scheduled payment amounts, amounts actually paid and the dates those payments were made. ND: No Data. Mar = Actual amount paid (\$)

্টিটিই = Date payment received = Scheduled payment amount (\$) = Account balance (\$) Sep12 Sep13 May13 Apr13 ₩ar13 Feb13 Jan13 Dec12 Sep12 Aug13 Jul13 Jun13 Nov12 Oct12 16,417 16.361 17,477 17,359 17,223 17,156 16,972 16,940 16,921 16.828 16,753 16,681 16.585 16,510 ND ND ND ΝD ND ΝD ND ΝD ND ND ΝD ND ND ND ND ND ND ND NĐ ND 4/4 ND ND ND ND ND ND ND ND ΝD ND ND ND ND ND ND The original amount of this account was \$16,254

BANK OF AMERICA PO BOX 982235 EL PASO TX 79998 No phone number available Partial account number 488893299799.... Address identification number 0040187576

Date opened Jul 2001 First reported Jul 2007 Date of status Dec 2009

Type Credit card Terms Monthly payment Not reported

Credit limit or original amount \$18,000 Not reported High balance \$14,471

Recent balance Not reported as of Jul 2012

Responsibility Joint with OLGA GOFMAN Status Closed. \$12,137 written off.

Comment Account closed at consumer's request.

Creditor's statement

"Purchased by another lender."

Page 5 of 24 Prepared for: GENNADIY GOFMAN Date: December 03, 2013 Report number: 4254-6060-66 iscopunts that may be considered negative (committee) Payment history 2010 2009

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2010 JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL BANK OF AMERICA PO BOX 982235 EL PASO TX 79998 Date opened Type Credit limit or Recent balance Responsibility No phone number available Apr 1999 Credit card Joint with original amount Not reported as of 4 2C 420 account number First reported Terms \$28,300 Jul 2012 OLGA GOFMAN 426429899623 Aug 2003 Not reported High balance Status Address identification number Date of status Closed, \$16,254 written off. Monthly \$21,902 0040187576 Nov 2009 Comment payment Not reported Account closed at consumer's request. Self-mont signory Creditor's statement "Purchased by another lender." 2010 2009

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OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV CHASE BANK USA 10 BOX 15298 WILMINGTON DE 19850 Phone number Date opened Type Credit limit or Recent balance Responsibility Nov 2002 (800) 955 9900 Credit card original amount Not reported Individual Partial account number First reported \$3.500 Terms Status Closed, \$4,168 past due as of Nov 2011. 4 104 13000878.... Dec 2002 Not reported High balance Od 13000878... Od Oress identification number Date of status Monthiy \$7,599 Creditor's statement "Purchased by another lender." Nov 2011 payment Not reported and the same placed. 2007 2006 2005

MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DE